

ALEX G. TSE (CABN 152348)
Acting United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

JOHN H. HEMANN (CABN 165823)
JEFFREY SHIH (MABN 663195)
Assistant United States Attorneys

SCOTT K. MCCULLOCH (DCBN 1020608)
CHRISTOPHER OTT (CABN 235659)
Trial Attorneys, National Security Division

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
john.hemann@usdoj.gov; 415.436.7478
jeffrey.shih@usdoj.gov; 415.436.7168

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:17-CR-103 VC
)	
Plaintiff,)	MOTION AND [PROPOSED] ORDER TO SEAL
)	UNITED STATES RESPONSE TO DEFENDANT'S
v.)	SUPPLEMENTAL SENTENCING SUBMISSION
)	
KARIM BARATOV,)	
)	Sentencing Date: April 24, 2018
Defendant.)	Time: 10:30 a.m.
)	Court: Honorable Vince Chhabria

The United States hereby moves the Court for an order sealing the United States Response to Defendant's Supplemental Sentencing Submission and the accompanying declaration. The United States makes this request for the same reasons asserted by the defendant in requesting that the Defendant's Supplemental Sentencing Submission be filed under seal.

1 The United States also requests that, notwithstanding any sealing order, the Clerk of Court be
2 required to give endorsed, filed copies of the sealed documents to the United States Attorney's Office.

3 DATED: April 20, 2018

Respectfully submitted,

4 ALEX G. TSE
5 Acting United States Attorney

6 /s/ Jeffrey Shih
7 JEFFREY SHIH
8 Assistant United States Attorney
9
10
11

12 [PROPOSED] ORDER

13 Upon the motion of the United States and for good cause appearing, IT IS HEREBY ORDERED
14 THAT the Clerk of the Court file the United States Response to Defendant's Supplemental Sentencing
15 Submission and the accompanying declaration under seal and maintain the documents under seal until
16 further notice of this Court. Endorsed, filed copies shall be provided to the United States Attorney's
17 Office.
18

19 DATE:

20 HONORABLE VINCE CHHABRIA
21 UNITED STATES DISTRICT JUDGE
22
23
24
25
26
27
28